

1 RALPH E. LAIRD (State Bar No. 166984)
Mackenroth & Laird, LLP
2 134 Almond Street
Auburn, CA 95603
3 Tel: (530) 889-1912
Fax: (530) 889-1962

4 Attorneys for Plaintiff
5 Alexandra Nicholson

6 CYNTHIA L. MELLEMA (State Bar No. 122798)
7 JEFFRY BUTLER (State Bar No. 180936)
MEGAN BARKER (State Bar No. 245991)
8 SNR Denton US LLP
525 Market Street, 26th Floor
9 San Francisco, CA 94102-2734
Telephone: (415) 882-5000
10 Facsimile: (415) 882-0300

11 Attorneys for Defendant
Allstate Insurance Company

12
13
14 UNITED STATES DISTRICT COURT
15 EASTERN DISTRICT OF CALIFORNIA
16

17 Alexandra Nicholson,) No. 2:11-cv-03018-GEB-KJN
18 Plaintiff,)
19 v.) **Stipulation and [Proposed] Order**
20 Allstate Insurance Company, et al.,) **Continuing Dates Set in Scheduling**
21 Defendants.) **Order**
22 _____)

23 The Parties, by and through their respective counsel of record, hereby stipulate and agree as
24 follows and respectfully request the Court to approve and give effect to their stipulation:

25 1. On October 9, 2012, Ronald C. Schwarzkopf, of Schwarzkopf Law, substituted in as
26 counsel for Plaintiff Alexandra Nicholson in place of her former attorney, Jon S. Allin, formerly of
27 Schwarzkopf & Allin. At that time, Mr. Allin was winding up his practice and commencing a
28 position with the California Attorney General's Office.

1 2. On Friday, December 7, 2012, Ralph E. Laird, of Mackenroth & Laird, LLP,
2 substituted in as counsel for Plaintiff Alexandra Nicholson in place of her former attorney, Ronald
3 C. Schwarzkopf.

4 3. The parties have proceeded with additional written discovery and productions of
5 documents and have completed the depositions of Plaintiff and an Allstate employee, Jess Molina.
6 Two depositions are currently scheduled for March 22nd, and additional depositions are anticipated
7 and would preferably be completed before the initial expert disclosure date which is currently March
8 29, 2013. One of the witnesses had a death in his family which caused continuance of his deposition,
9 which remains to be scheduled. The parties have agreed to continue the dates for the initial expert
10 witness disclosure and the rebuttal expert disclosure as set forth below. The parties believe
11 continuance of these disclosure dates will not impact any of the other dates currently set in the
12 scheduling order.

13 4. The existing scheduling order dates are as follows:

14	Initial expert witnesses disclosed by:	March 29, 2013
15	Rebuttal experts disclosed by:	April 26, 2013
16	All discovery completed by:	June 29, 2013
17	Last hearing date for motions:	August 26, 2013
18	Final Pretrial Conference:	November 4, 2013
19	Trial to commence:	January 28, 2014

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 NOW, THEREFORE, IT IS AGREED AND STIPULATED THAT good cause exists to
2 continue to the dates for initial expert witnesses disclosure and rebuttal expert disclosure to the
3 following dates:

4 Initial expert witnesses disclosed by: April 26, 2013

5 Rebuttal experts disclosed by: May 24, 2013

6 The date for completion of discovery, the last date for motions, the date for the Final Pretrial
7 Conference, and the date to commence Trial shall remain the same as set forth herein above.

8 Dated: March 18, 2012

MACKENROTH & LAIRD LLP

9
10 By: /s/ Ralph E. Laird
11 Ralph E. Laird
12 Attorneys for Plaintiff
Alexandra Nicholson

13 Dated: March 18, 2012

SNR DENTON US LLP

14
15 By: /s/ Jeffry Butler (as authorized on 3/18/12)
16 Jeffry Butler
17 Attorneys for Defendant
Allstate Insurance Company

18
19 IT IS SO ORDERED.

20 Dated: March 20, 2013

21
22 
23 GARLAND E. BURRELL, JR.
Senior United States District Judge